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11 *Attorneys for Plaintiff Crago, Inc. and the*  
12 *Proposed Direct Purchaser Class*

13 **UNITED STATES DISTRICT COURT**

14 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

15 Crago, Inc., on behalf of itself and others  
similarly situated.

16 Plaintiff,

17 vs.

18 Chunghwa Picture Tubes, Ltd., Chunghwa  
Picture Tubes (Malaysia) Sdn. Bhd.,  
Hitachi, Ltd., Hitachi America, Ltd.,  
20 Hitachi Asia, Ltd., Irico Group Corp., Irico  
Display Devices Co., Ltd., LG Electronics,  
Inc., Matsushita Electric Industrial Co, Ltd.,  
Panasonic Corporation of North America,  
Orion Electric Co., Ltd., Orion America,  
Inc., Koninklijke Philips Electronics N.V.,  
23 Philips Electronics North America,  
Samsung SDI Co., Ltd., Samsung SDI  
America, Inc., Samtel Color, Ltd., Thai  
CRT Company, Ltd., Toshiba Corporation,  
25 Beijing-Matsushita Color CRT Company,  
Ltd., Matsushita Toshiba Picture Display  
Co., Ltd., and LP Displays International,  
Ltd.

27 Defendants.

19 Case No. C07-5944 SC

20 **STIPULATION RE EXTENSION  
OF TIME FOR DEFENDANT TO  
RESPOND TO COMPLAINT;  
[PROPOSED] ORDER EXTENDING  
TIME TO RESPOND TO  
COMPLAINT AND COMPLAINTS IN  
RELATED ACTIONS**

1           WHEREAS the undersigned plaintiff has filed the above-captioned case;

2           WHEREAS plaintiff alleges antitrust violations by manufacturers, distributors, and  
3 sellers of Cathode-Ray Tubes and products containing Cathode-Ray Tubes (collectively  
4 “CRT products”);

5           WHEREAS six complaints have been filed to date in federal district courts  
6 throughout the United States by plaintiffs purporting to bring class actions on behalf of  
7 direct and indirect purchasers alleging antitrust violations by manufacturers, distributors,  
8 and sellers of CRT products (collectively “the CRT Cases”);

9           WHEREAS, a motion is pending before the Judicial Panel on Multidistrict  
10 Litigation to transfer the CRT cases to this jurisdiction for coordinated and consolidated  
11 pretrial proceedings pursuant to 28 U.S.C. Section 1407, a response to the motion  
12 supporting coordination or consolidation has been filed, and plaintiff and defendant  
13 Samsung SDI America, Inc. anticipate that additional responses will be filed;

14           WHEREAS plaintiff anticipates the possibility of Consolidated Amended  
15 Complaints in the CRT Cases;

16           WHEREAS plaintiff and Samsung SDI America, Inc. have agreed that an orderly  
17 schedule for any response to the pleadings in the CRT Cases would be more efficient for  
18 the parties and for the Court;

19           WHEREAS plaintiff agrees that the deadline for Samsung SDI America, Inc. to  
20 answer, move, or otherwise respond to its Complaint shall be extended until the earliest of  
21 the following dates: (1) forty-five days after the filing of a Consolidated Amended  
22 Complaint in the CRT Cases; or (2) forty-five days after plaintiff provides written notice to  
23 Samsung SDI America, Inc. that plaintiff does not intend to file a Consolidated Amended  
24 Complaint, provided however, that in the event that Samsung SDI America, Inc. should  
25 agree to an earlier response date in any CRT case, Samsung SDI America, Inc. will  
26 respond to the Complaint in the above-captioned action on that earlier date;

27           WHEREAS plaintiff further agrees that this extension is available, without further  
28 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in

1 writing of their intention to join this Stipulation;

2        WHEREAS this Stipulation does not constitute a waiver by Samsung SDI America,  
3 Inc. of any defense, including but not limited to the defenses of lack of personal  
4 jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or service  
5 of process;

6        WHEREAS, with respect to any named defendant joining the Stipulation, this  
7 Stipulation does not constitute a waiver of any defense, including but not limited to the  
8 defenses of lack of personal jurisdiction, subject matter jurisdiction, improper venue,  
9 sufficiency of process or service of process.

10      PURSUANT TO LOCAL RULE 6-1(a), PLAINTIFF AND DEFENDANT  
11 SAMSUNG SDI AMERICA, INC., BY AND THROUGH THEIR RESPECTIVE  
12 COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

13      1. The deadline for Samsung SDI America, Inc. to answer, move, or otherwise  
14 respond to plaintiff's Complaint shall be extended until the earliest of the following dates:  
15 (1) forty-five days after the filing of a Consolidated Amended Complaint in the CRT  
16 Cases; or (2) forty-five days after plaintiff provides written notice to Samsung SDI  
17 America, Inc. that plaintiff does not intend to file a Consolidated Amended Complaint,  
18 provided however, that in the event that Samsung SDI America, Inc. should agree to an  
19 earlier response date in any CRT case, except by court order, Samsung SDI America, Inc.  
20 will respond to the Complaint in the above-captioned case on that earlier date.

21      2. This extension is available, without further stipulation with counsel for  
22 plaintiff, to all named defendants who notify plaintiff in writing of their intention to join  
23 this Stipulation;

24      3. This Stipulation does not constitute a waiver by Samsung SDI America, Inc.,  
25 or any other named defendant joining the Stipulation of any defense, including but not  
26 limited to the defenses of lack of personal jurisdiction, subject matter jurisdiction,  
27 improper venue, sufficiency of process or service of process.

28      / / /

1 IT IS SO STIPULATED.  
2

3 DATED: December 13, 2007

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26 *Attorneys for Plaintiff Crago, Inc. and*  
27 *the Proposed Direct Purchaser Class*

28 DATED: December 13, 2007

1 By: /s/ Michael W. Scarborough  
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9 *Attorneys for Defendant Samsung SDI*  
10 *America, Inc.*

11 Pursuant to General Order 45, Part X-B, the filer attests that concurrence in the  
12 filing of this document has been obtained from Michael W. Scarborough.

13    ///

**PROPOSED ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

3 IT IS FURTHER ORDERED THAT, to conserve party and judicial resources and  
4 in light of the proceedings currently pending before the Judicial Panel on Multidistrict  
5 Litigation to consolidate and transfer all pending CRT Cases to one Court, this extension is  
6 available in all related actions (both current actions and those to be related in the future) to  
7 any defendant that provides written notice to plaintiff's counsel in such action of this Order  
8 and its intention to join this extension, without further stipulation with counsel for  
9 plaintiff(s) in the related actions.

10  
11 Dated: 12/19/07

